

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

ANNETTE BARAJAS,
Plaintiff,

v.

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,
Defendant.

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CASE NO. 5:15-cv-00227-C

**DEFENDANT HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY'S
UNOPPOSED MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

TO THE HONORABLE U.S. DISTRICT JUDGE SAM R. CUMMINGS:

Defendant Hartford Life and Accident Insurance Company ("Hartford") files this Unopposed Motion to Proceed Without Local Counsel and would respectfully show:

1. Hartford is represented by Lisa Magids of Sedgwick LLP out of its office in Austin, Texas. Sedgwick LLP also has an office in Dallas, Texas. Lisa Magids is a member in good standing of the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas. Ms. Magids regularly represents clients involved in claims brought under the Employee Retirement Income Security Act of 1974 ("ERISA"), 29 U.S.C. § 1001, *et. seq.*, and is familiar with the issues and applicable law in this area.

2. Hartford's attorney will travel to hearings as necessary and fully participate in matters which require her personal attendance. Hartford respectfully requests that it be permitted to proceed without local counsel.

3. Hartford's counsel has conferred with Plaintiff's counsel on this motion and Plaintiff does not oppose this motion.

Respectfully submitted,

/s/ Lisa Magids

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**ATTORNEYS FOR DEFENDANT
HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY**

CERTIFICATE OF SERVICE

This is to certify that on February 5, 2016, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, and have served such filing on all counsel of record, as listed below and in the manner indicated:

Via E-filing thru CM/ECF

Lonnie Roach
Lloyd E. Bemis III
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/s/ Lisa Magids

LISA MAGIDS